

**Council on Diversity and Inclusion
Florida State University College of Medicine
Procedures for Handling Reports of Discrimination or Bias**

April 2, 2018

The Council on Diversity and Inclusion hereby establishes and publicizes its procedures for receiving and responding to reports of discrimination, bias, and related concerns.

The procedures consist of eight parts: (i) goal and objectives; (ii) relationship to other reporting mechanisms; (iii) information security and workflow; (iv) membership on the Subcommittee to Address Reports of Discrimination or Bias; (v) authority to investigate and respond to reports; (vi) description of information sharing and reporting to College of Medicine leadership; (vii) revisions to these procedures.

I. Goal and Objectives

Goal: To advance the mission of the College of Medicine by being proactive in creating and maintaining a culture of respect for diversity and inclusiveness; of positive affirmation of individual and cultural differences; of equal respect for all persons; and of wellness for all members of the College of Medicine community.

Objectives:

1. Create a confidential and non-retaliatory process for all members of the College of Medicine community – including all students, residents and fellows, faculty, and staff, including at all regional campuses – to report concerns of discrimination, bias, and related issues to a subcommittee of the Council on Diversity and Inclusion;
2. Create a transparent, clearly defined set of procedures for how reports are handled, who has access to reports, how confidentiality will be maintained and when it must be broken, when and how information may be shared with College leadership, etc.;
3. Publicize procedures for handling reports;
4. Create de-identified summaries for use in developing educational activities aimed at preventing inappropriate behavior, and for use by the Council on Diversity and Inclusion and the Dean’s office in gauging overall climate at the College of Medicine.

II. Relationship to Other Reporting Mechanisms

Within the College of Medicine, medical students may report mistreatment to the Division of Student Affairs & Admissions, via the [Report of Mistreatment of a Student form](#). The Council’s reporting mechanism does not supplant the mistreatment reporting system, but supplements it.

Students enrolled in the medical degree program have the option to report to either (or both) of these reporting systems, depending on their preference or what the student feels is more appropriate for their situation. By contrast, all other students, including Doctoral, Master's, and Physician Assistant students, as well as all faculty and staff, should report incidents of discrimination, bias, and related concerns to the Council.

Within Florida State University (beyond the College of Medicine), there are several additional reporting systems, open to all students, faculty, and staff, at report.fsu.edu, as well as the campus-wide anonymous reporting system, [EthicsPoint](#).

The Council's reporting system is intended to supplement existing reporting systems, and to create a mechanism internal to the College of Medicine for receiving and addressing concerns from all members of the COM community. The ultimate aim is to advance the mission of the College, by promoting an inclusive culture of positive affirmation of differences, and by preventing future concerning incidents.

The fact that there is a separate system for reporting medical student mistreatment deserves clarification. Mistreatment of medical students is a longstanding issue of national concern. As such, nationally authoritative bodies, including the Liaison Committee on Medical Education (LCME) and the Association of American Medical Colleges (AAMC) treat medical student mistreatment as a distinct entity that must be specifically addressed by medical schools. For example, the LCME requires written policies that address medical student mistreatment, including mechanisms for reporting incidents of mistreatment (LCME element 3.6, 2018 issue). The Medical School Graduation Questionnaire, administered by the AAMC, has several questions related specifically to medical student mistreatment.

The Division of Student Affairs & Admissions at FSU COM has historically received reports of medical student mistreatment, and has monitored medical student mistreatment as reported through the Graduation Questionnaire. Furthermore, given its institutional role in supporting medical student success, the Division of Student Affairs & Admissions is well situated to continue to receive and address such reports. The Council does not control the handling of any reports submitted to the Division of Student Affairs & Admissions.

However, the Council's intent is to develop a system that is open to all students of all programs, as well as all faculty and staff. Thus, anyone may submit a report of discrimination, bias, or related concerns to the Council, whereas medical students may choose to submit either to the Council or via the Mistreatment Reporting form, depending on their preference.

III. Information Security and Workflow

The Office of Information Technology (IT) will oversee information security, which should include secure server spaces, password-protected access, and access by IT staff limited to

specific individuals. This should ensure that all members of the community, including staff from IT, are comfortable submitting reports if they wish. Upon implementing secure data collection and storage based on IT recommendations, a more specific and detailed description of information security should be included in this document.

Links to submit reports to the Council on Diversity and Inclusion will be prominently placed in appropriate locations on the COM website (e.g., on the Council's page), and will be advertised at regular and appropriate intervals to all members of the College of Medicine. The names and photographs (if available) of those individuals who will handle reports (discussed below in Section IV) should be posted as well, along with brief descriptions of information security, workflow, and a link to this procedure document, for complete transparency.

The reporting page should include a note to the effect that reporters are free to provide contact information or not, however, it may be more difficult to address the report should the reporter choose not to provide contact information. Furthermore, a disclaimer will be included, stating that any reports of sexual harassment or discrimination are required to be reported to the Office of Equal Opportunity and Compliance, in compliance with Title IX and [FSU Policy 2-2](#).

When a report is submitted, those members of the Council who will handle reports will receive a notification that a report has been received, and should then use secure credentials to log into the respective server space to access the report.

IV. Membership on the Subcommittee to Address Reports of Discrimination or Bias

The Council on Diversity and Inclusion consists of over 20 members, including faculty, staff, and students. It is neither appropriate nor feasible for the entire Council to receive and respond to reports. Therefore, a subcommittee of the Council is established, hereinafter the Subcommittee to Address Reports of Discrimination or Bias ("the Subcommittee").

The Subcommittee will consist of approximately 3 members, who will be selected and, if they agree to serve, appointed to this role by the Council on Diversity and Inclusion. The Subcommittee will be under the auspices of the Council but may include 1 or 2 members who are not currently members of the Council. The Council will appoint the Chair of the Subcommittee. The term of appointment to the Subcommittee is one year, and is renewable.

This document does not prescribe specific rules for membership on the Subcommittee. Instead, the overarching values that should guide selection of the Subcommittee are as follows. The Subcommittee should have a diverse membership. Consideration should be given to the sensitive nature of reports that may be received, and to creating a reputation among the College that the Subcommittee is trustworthy, sensitive to a variety of issues regarding discrimination and bias, will not retaliate, and will in fact respond appropriately to reports. Finally, attention must be given to hierarchies of power and authority that will be brought into the Subcommittee

as a result of potential members' institutional roles, personalities, and other factors. The Subcommittee must be a body in which every member feels and is empowered to speak authentically and honestly, and all voices must be heard equally.

Subcommittee members may be removed prior to the end of their one-year period by a simple majority vote at any Council meeting with quorum, and any Council member may move for the removal of a Subcommittee member. It is preferable, but not mandatory, that concerns regarding the member's performance be addressed with the member, who may be given opportunity for response prior to removal; however, this is not mandatory. Any member of the College of Medicine community may bring concerns about a Subcommittee member or their performance to any member of the Council on Diversity and Inclusion.

In accepting responsibility for membership on the Subcommittee, members agree to meet to discuss reports as they are received, and to engage in self-education on best practices for handling such reports. No specific timeline or educational materials are prescribed; members should determine their own educational needs.

V. Authority to Investigate and Respond to Reports

To be effective in achieving the purpose for which the reporting system is instituted, the Subcommittee must hold broad discretion, based on professional judgment, in how it responds to reports. The Subcommittee is empowered to investigate reports to develop a fair and impartial understanding of the reported incident(s). The Subcommittee may elect to privately discuss incidents of concern with individuals named in a report, in an effort to provide corrective feedback. The Subcommittee may also contact executive bodies, such as a Chair, the Dean's Office, Student Affairs, the Medical Student Evaluation and Promotion Committee, etc., and recommend disciplinary measures, if appropriate. The Subcommittee should be seen as an advocate for anyone with a legitimate complaint of discrimination or bias, and should ensure (insofar as possible) that a prompt and appropriate institutional response is taken.

No executive powers can be either conferred or removed by this statement of the Council's procedures. The Council does not have the authority, for example, to suspend or terminate employment, or to discipline or expel a student. However, the Subcommittee does have the authority to make a formal written recommendation to the appropriate executive unit, if it deems this appropriate for the case at hand. In keeping with the goal of this reporting system, such a recommendation is expected to bear some presumptive weight in the relevant executive body's deliberation.

If the reporter provides contact information, then their preferences regarding who may or may not be consulted, along with potential responses to the report should, except in the most exceptional cases, be determinative.

VI. Description of Information Sharing and Reporting to College of Medicine Leadership

One purpose of instituting a confidential reporting system is to allow for a more accurate assessment of the climate of the College, which in turn will allow for more targeted interventions to address needed areas of improvement. Therefore, de-identified, composite reports will be generated, to identify themes as well as trends over time. These de-identified summaries will be shared on a regular basis with leadership of the College, including the Council on Diversity and Inclusion, the Office of the Dean and the Senior Associate Dean for Academic Affairs, along with other relevant leadership. The purpose of sharing de-identified summaries is to improve the climate and ultimately advance the mission of the College.

An area of complication pertains to reports that may be received from medical students, and which appear to constitute “mistreatment” (not all reports from medical students, by definition, constitute a report of mistreatment). The Associate and Assistant Deans of Student Affairs & Admissions have a legitimate need to know about such reports in order to perform their institutional duties and to protect student wellbeing. Therefore, if a report appears to be of mistreatment of a medical student, the Subcommittee is expected to share the report and work collaboratively with the Deans of Student Affairs & Admissions to ensure an appropriate institutional response. The Subcommittee may choose not to share the report however if the reporter provides contact information and asks that Student Affairs not be involved; or if the report involves a concern about mistreatment by someone in Student Affairs. In such an instance, the Subcommittee should nonetheless discuss the issue with another senior ranking member of the executive administration, such as the Senior Associate Dean for Academic Affairs or the Dean.

In general, all reports will be treated as confidential, and shared only on a “need to know” basis, if the Subcommittee determines that involving others will help to effect an appropriate institutional response.

VII. Revisions to these Procedures

This is an internal document of the Council on Diversity and Inclusion, describing procedures for handling reports of discrimination and bias. It is written in an effort to make such procedures clear and transparent, so they can be publicized along with the reporting tool, and thus so that potential reporters may make an informed choice as to whether they wish to submit a report.

As an internal Council document, the Council alone has the authority to make revisions as it deems necessary. All revisions should be guided by the overarching goal of establishing a reporting mechanism, experience and feedback from handling reports, and transparency. Thus, any revisions must be published on the website and otherwise made transparent to the College of Medicine community.